

**TROY LAW, PLLC**

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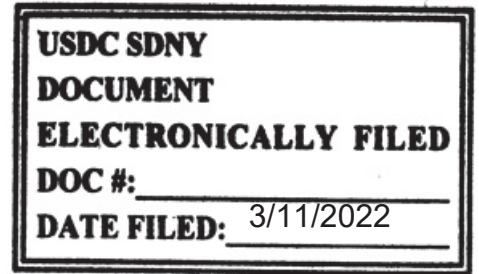
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March 10, 2022

**Via ECF**

Hon. Robert W. Lehrburger, U.S.M.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007



**Re: Request for Extension of Time to Submit Settlement Agreement**  
*Geng v. Shu Han Ju II Corp*, No. 18-cv-12220 (RWL), (S.D.N.Y.)

Your Honor,

I represent the Plaintiffs in the above-referenced matter. I write respectfully, and with the consent of Defense counsel having met and conferred by telephone at about 4:00 PM today, to request that the time for Plaintiffs, and appearing Defendants (the Parties) to submit an executed settlement agreement be extended to March 31, 2022.

The Parties settled in principle on February 9, 2022, and the material terms were stated on the record, to wit: appearing Defendants to pay \$300,000.00, in 25 monthly installments, with the first installment to be \$60,000.00 and the remaining installments to be \$10,000.00 apiece; appearing Defendants to each execute a confession of judgment for double the amount due payable immediately, with a 10-day notice-and-cure period.

Plaintiffs' counsel were to draft the agreement, and the parties were to present it within thirty days of February 9, 2022 (that is, by March 11, 2022). Accordingly, on February 15, 2022, I informed Defense counsel that we were drafting an offer of judgment that Plaintiffs would be willing to accept, thinking that this process would be quicker; however, later that same day, Defense counsel informed me that Defendants would only proceed by settlement agreement. Accordingly, I drafted a settlement agreement and emailed it to Defense counsel on February 28, 2022.

I asked Defense counsel for his thoughts by email on March 1, 2022. He replied later that same day that he was reviewing it with his clients. However, I received no follow-up, and accordingly I emailed Defense counsel asking for a response this morning, March 10, 2022, at 8:09 AM. Having received no response, I emailed Defense counsel a copy of this letter, and called him to meet and confer, at about 4:00 PM.

At the meet-and-confer, Defense counsel told me Defendants were still reviewing the agreement. I informed him that even if Defense counsel was to tell me tomorrow that the agreement was accepted in full with no proposed changes, and had been fully-executed (including the confessions of judgment) by all the appearing Defendants, I would likely be unable to obtain the signatures of all sixteen Plaintiffs in time to submit a fully-executed agreement by March 11, 2022.

Hon. Robert W. Lehrburger, U.S.M.J.

March 10, 2022

*Geng v. Shu Han Ju II Corp*, No. 18-cv-12220 (RWL), (S.D.N.Y.)

Page 2 of 2

We agreed that in light of this, it made sense to ask for a brief extension of time to submit a fully-executed settlement agreement.

For the above-stated reasons, I ask respectfully, and with the consent of Defense counsel, that the Parties' time to submit an executed settlement agreement be extended to March 31, 2022.

We thank the Court for its attention to and consideration of this matter.

Respectfully submitted,  
TROY LAW, PLLC

/s/ Aaron B. Schweitzer

Aaron Schweitzer

*Attorney for Plaintiffs*

cc: via ECF  
all counsel of record  
/asb

SO ORDERED:



3/11/2022

HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE